

**In The United States District Court
for the Northern District of Illinois
Eastern Division**

JUDGE NORDBERG

THE MONOTYPE CORPORATION,
a Delaware corporation,

Plaintiff,

vs.

RED HAT, INC.,
a Delaware corporation,

Defendant.

02C 37 13

**MAGISTRATE JUDGE
GERALDINE SOAT BROWN**

FILED

MAY 23 2002

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

COMPLAINT

Now comes THE MONOTYPE CORPORATION, Plaintiff herein, by its attorneys, Paul F. Stack and Robert A. Filpi, and complaining of RED HAT, INC., states as follows:

The Parties

1. The Monotype Corporation ("MONOTYPE") is a Delaware corporation with its principal place of business in Elk Grove Village, Illinois.
2. Red Hat, Inc. ("RED HAT") is a Delaware corporation with its principal place of business in Raleigh, North Carolina.

Jurisdiction

3. This Honorable Court has jurisdiction over the subject matter of this action pursuant to Title 15, United States Code, Section 1121(a) (Lanham Act), and Title 28, United States Code, Sections 1331, 1338(a), and 1367 and Title 17, United States Code, Section 501 (a) and (b).

4. Venue properly lies in this district pursuant to Title 28, United States Code, Section 1391(b)(2).

Count I (Trademark Infringement - "Times New Roman")

5. MONOTYPE is the owner of the trademark "Times New Roman" for the following products:

Typefaces, typefonts, and type designs of alphanumeric characters and/or typographical symbols recorded as latent images in data storage media -- namely, magnetic tape, magnetic disc, optical memories and integrated circuit memories, such as ROMS, PROMS and EPROMS, in Class 9 (U.S. Cls. 26 and 38)

Typefaces, typefonts and type designs of alphanumeric characters and/or typographical symbols recorded as visible images in printer's type, printer's matrices or printed matter, dry transfer press lettering, photographic images, thermal images, ink jet images and video images, in Class 16 (U.S. Cls. 14 and 38).

6. The trademark "Times New Roman" is registered with the United States Patent and Trademark Office as Registration No. 1,340,165, with a

registration date of June 11, 1985. The trademark "Times New Roman" is statutorily incontestable pursuant to Section 15 of the Lanham Act, 15 U.S.C. §1065. A true and accurate copy of the certificate of registration of the trademark "Times New Roman" is attached as Exhibit "A" to this Complaint and by that reference is made a part hereof.

7. For many years prior to the acts alleged in this complaint, and to this day, MONOTYPE's licensee, AGFA MONOTYPE CORPORATION, and MONOTYPE's predecessors, The Monotype Corporation plc. and The Monotype Corporation Ltd, have continuously used the mark "Times New Roman" in connection with the creation, licensing and distribution of digitized typeface designs. MONOTYPE's licensee, AGFA MONOTYPE CORPORATION, and MONOTYPE's predecessors, The Monotype Corporation plc and The Monotype Corporation Ltd, have spent great sums creating digitized typeface designs identified by this mark, advertising this mark, licensing this mark, and protecting and enforcing this mark. The digitized typeface designs identified by the mark "Times New Roman" enjoy a widespread and favorable reputation for quality, consistency, legibility, and reliability.

8. RED HAT is presently distributing a product in the Northern District of Illinois and elsewhere which is styled "Red Hat Linux 7.3 Operating System" (hereafter "Linux 7 OS"). The Linux 7 OS product is being distributed

in a compact disk - read only memory ("CD-ROM") format at retail stores, including the Best Buy outlet in Schaumburg, Illinois, and through download from the Internet at the website operated by RED HAT which has a Uniform Resource Locator ("URL") of www.redhat.com.

9. Linux 7 OS is a computer program which consists of a Linux based operating system, together with other software programs incorporated therein.

10. Included within Linux 7 OS is a computer program which, when used in conjunction with appropriate hardware and software, generates human readable versions of typeface designs. The typeface designs generated by this program are identified within Linux 7 OS by the mark "Times New Roman."

11. The digitized typeface designs in Linux 7 OS identified by the mark "Times New Roman" are copies of the typeface designs generated by the computer program identified by the mark "Times New Roman."

12. The computer programs in Linux 7 OS which are identified by the mark "Times New Roman" are not true and accurate copies of computer programs owned by MONOTYPE but instead are alterations and derivative works of such computer programs owned by MONOTYPE. MONOTYPE does not know who altered such computer programs and made such derivative works, states that no one had any right or license to make such alterations or derivative works, but states that it appears that the name "Peter Soos" appears

on such computer programs in Linux 7 OS as the creator of such programs and, upon information and belief, based upon Internet research, said Peter Soos does business out of Hungary.

13. RED HAT has no license or other right to use the mark "Times New Roman" in conjunction with digitized typeface designs, with Linux 7 OS, or with any other product. MONOTYPE does not consent to any use of the mark "Times New Roman" by RED HAT.

14. The use of "Times New Roman" by RED HAT is a direct infringement of MONOTYPE's rights in the trademark "Times New Roman."

15. RED HAT's use of the mark "Times New Roman" in connection with the distribution of digitized typeface designs is likely to induce the public to believe, contrary to fact, that RED HAT's digitized typeface designs originated with, are sponsored by, or are otherwise licensed or approved by, or connected with, MONOTYPE. As such, RED HAT's conduct is likely to cause confusion as to the source or sponsorship of the digitized typeface designs being distributed with this mark.

16. RED HAT's use of the mark "Times New Roman" in connection with the distribution of digitized typeface designs is likely to cause confusion, mistake and deception, and therefore such use and threatened use infringes MONOTYPE's exclusive rights in the mark "Times New Roman" at common

law and under Section 32(1) of the Lanham Act, Title 15, United States Code, Section 1114.

17. RED HAT's use of the mark "Times New Roman" to identify altered versions of computer programs that generate those typeface designs, is causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

18. Unless enjoined by this court, RED HAT will continue to infringe MONOTYPE's trademark "Times New Roman" thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

NOW THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed MONOTYPE's rights in the trademark "Times New Roman" both at common law and pursuant to the Lanham Act.

B. Entry of a judgment declaring that RED HAT has otherwise injured MONOTYPE's reputation in the manner complained of herein;

C. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, parents, and affiliates, and all others privy or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) using “Times New Roman” or any other colorable imitation of MONOTYPE’s trademark “Times New Roman” in connection with the advertising, marketing, sale and distribution of digitized typeface designs;

(ii) making any statement or representation that would cause the public to believe, contrary to fact, that digitized typeface designs or products distributed by RED HAT, are sponsored, approved or endorsed or otherwise connected or affiliated with MONOTYPE;

(iii) advertising, licensing, selling and/or distributing within the United States any product which contains digitized typeface designs identified by the name “Times New Roman” or any other colorable imitation of MONOTYPE’s trademark “Times New Roman;” including, without limitation, Linux 7 OS; and

(iv) otherwise infringing MONOTYPE’s registered trademark “Times New Roman”

D. Entry of a judgment requiring RED HAT to pay MONOTYPE such damages as MONOTYPE has sustained as a result of the aforesaid trademark infringement and directing that such damages be trebled in accordance with Section 35 of the Lanham Act, 15 U.S.C. § 1117;

E. Entry of a judgment requiring RED HAT to account to MONOTYPE for and pay to MONOTYPE all profits RED HAT has realized which are attributable to the aforesaid acts of the trademark infringement;

F. Entry of a judgment that this case is an exceptional one and that MONOTYPE be awarded its reasonable attorneys fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just, including an award of the costs of this proceeding.

Count II
(Trademark Infringement - "Arial")

19. MONOTYPE is the owner of the trademark "Arial" for the following products:

Typefaces, typefonts, and type designs of alphanumeric characters and/or typographical symbols recorded as latent images in data storage media -- namely, magnetic tape, magnetic discs, compact discs, optical memories and integrated circuit memories, such as ROMS, PROMS and EPROMS, in Class 9 (U.S. Cls. 26 and 38)

Typefaces, typefonts and type designs of alphanumeric characters and/or typographical symbols recorded as latent images in data storage media -- namely, magnetic tape, magnetic disc, optical memories and integrated circuit memories, such as ROMS, PROMS and EPROMS, in Class 16 (U.S. Cls. 14 and 38).

20. The trademark "Arial" is registered with the United States Patent and Trademark Office in International Class 16 as Registration No. 1,322,088, with a registration date of February 26, 1985. This registration of the trademark "Arial" is statutorily incontestable pursuant to Section 15 of the Lanham Act, 15 U.S.C. §1065. A true and accurate copy of this certificate of registration of the trademark "Arial" is attached as Exhibit "B" to this Complaint and by that reference is made a part hereof.

21. The trademark "Arial" is registered with the United States Patent and Trademark Office in International Class 9 as Registration No. 2,270,853, with a registration date of August 17, 1999. A true and accurate copy of this certification of registration of the trademark "Arial" is attached as Exhibit "C" to this Complaint and by that reference is made a part hereof.

22. For many years prior to the acts alleged in this complaint, and to this day, MONOTYPE's licensee, AGFA MONOTYPE CORPORATION, and MONOTYPE's predecessors, The Monotype Corporation plc. and The Monotype Corporation Ltd, have continuously used the mark "Arial" in connection with the creation, licensing and distribution of digitized typeface designs. MONOTYPE's licensee, AGFA MONOTYPE CORPORATION, and MONOTYPE's predecessors, The Monotype Corporation plc and The Monotype Corporation Ltd, have spent great sums creating digitized typeface designs identified by this mark, advertising this mark, licensing this mark, and

protecting and enforcing this mark. The digitized typeface designs identified by the mark "Arial" enjoy a widespread and favorable reputation for quality, consistency, legibility, and reliability.

23. RED HAT is presently distributing a product in the Northern District of Illinois and elsewhere which is styled "Red Hat Linux 7.3 Operating System" (hereafter "Linux 7 OS"). The Linux 7 OS product is being distributed in a compact disk - read only memory ("CD-ROM") format at retail stores, including the Best Buy outlet in Schaumburg, Illinois, and through download from the Internet at the website operated by RED HAT which has a Uniform Resource Locator ("URL") of www.redhat.com.

24. Linux 7 OS is a computer program which consists of a Linux based operating system, together with other software programs incorporated therein.

25. Included within Linux 7 OS is a computer program which, when used in conjunction with appropriate hardware and software, generates human readable versions of typeface designs. The typeface designs generated by this program are identified within Linux 7 OS by the mark "Arial."

26. The digitized typeface designs in Linux 7 OS identified by the mark "Arial" are copies of the typeface designs generated by the computer program identified by the mark "Arial."

27. The computer programs in Linux 7 OS which are identified by the mark "Times New Roman" are not true and accurate copies of computer programs owned by MONOTYPE but instead are alterations and derivative works of such computer programs owned by MONOTYPE. MONOTYPE does not know who altered such computer programs and made such derivative works, states that no one had any right or license to make such alterations or derivative works, but states that it appears that the name "Peter Soos" appears on such computer programs in Linux 7 OS as the creator of such programs and, upon information and belief, based upon Internet research, said Peter Soos does business out of Hungary.

28. RED HAT has no license or other right to use the mark "Arial" in conjunction with digitized typeface designs, with Linux 7 OS, or with any other product. MONOTYPE does not consent to any use of the mark "Arial" by RED HAT.

29. The use of "Arial" by RED HAT is a direct infringement of MONOTYPE's rights in the trademark "Arial."

30. RED HAT's use of the mark "Arial" in connection with the distribution of digitized typeface designs is likely to induce the public to believe, contrary to fact, that RED HAT's digitized typeface designs originated with, are sponsored by, or are otherwise licensed or approved by, or connected with, MONOTYPE. As such, RED HAT's conduct is likely to cause confusion

as to the source or sponsorship of the digitized typeface designs being distributed with this mark.

31. RED HAT's use of the mark "Arial" in connection with the distribution of digitized typeface designs is likely to cause confusion, mistake and deception, and therefore such use and threatened use infringes MONOTYPE's exclusive rights in the mark "Arial" at common law and under Section 32(1) of the Lanham Act, Title 15, United States Code, Section 1114.

32. RED HAT's use of the mark "Arial" to identify altered versions of computer programs that generate those typeface designs, is causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

33. Unless enjoined by this court, RED HAT will continue to infringe MONOTYPE's trademark "Arial" thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

NOW THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed MONOTYPE's rights in the trademark "Arial" both at common law and pursuant to the Lanham Act.

B. Entry of a judgment declaring that RED HAT has otherwise injured MONOTYPE's reputation in the manner complained of herein;

C. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, parents, and affiliates, and all others privy or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) using “Arial” or any other colorable imitation of MONOTYPE’s trademark “Arial” in connection with the advertising, marketing, sale and distribution of digitized typeface designs;

(ii) making any statement or representation that would cause the public to believe, contrary to fact, that digitized typeface designs or products distributed by RED HAT, are sponsored, approved or endorsed or otherwise connected or affiliated with MONOTYPE;

(iii) advertising, licensing, selling and/or distributing within the United States any product which contains digitized typeface designs identified by the name “Arial” or any other colorable imitation of MONOTYPE’s trademark “Arial,” including, without limitation, Linux 7 OS; and

(iv) otherwise infringing MONOTYPE’s registered trademark “Arial”

D. Entry of a judgment requiring RED HAT to pay MONOTYPE such damages as MONOTYPE has sustained as a result of the aforesaid trademark infringement and directing that such damages be trebled in accordance with Section 35 of the Lanham Act, 15 U.S.C. § 1117;

E. Entry of a judgment requiring RED HAT to account to MONOTYPE for and pay to MONOTYPE all profits RED HAT has realized which are attributable to the aforesaid acts of the trademark infringement;

F. Entry of a judgment that this case is an exceptional one and that MONOTYPE be awarded its reasonable attorneys fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just, including an award of the costs of this proceeding.

COUNT III
(Copyright Infringement – TIMES NEW ROMAN TT)

34. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-110 is entitled “Times New Roman TT” A true and accurate copy of the certificate of registration is attached as Exhibit “D” hereto and by that reference is made a part hereof.

35. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare

derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

36. The software program identified as “timenrm_.pfb” in Linux 7 OS is a derivative work of MONOTYPE’s copyrighted computer program registered as aforesaid.

37. The copying and distribution of such derivative work of Monotype’s copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

38. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

39. Irreparable damage may be presumed from a showing of copyright infringement.

40. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE’s copyright in a computer program entitled “Times New Roman TT,” registered with the United States Copyright Office as Registration Number TX 5-112-110;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-110;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-110 including, but not limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-110;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT IV
(Copyright Infringement– TIMES NEW ROMAN ITALIC TT)

41. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-111 is entitled "Times New Roman Italic TT" A true and accurate copy of the certificate of registration is attached as Exhibit "E" hereto and by that reference is made a part hereof.

42. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

43. The software program identified as “timenri_.pfb” in Linux 7 OS is a derivative work of MONOTYPE’s copyrighted computer program registered as aforesaid.

44. The copying and distribution of such derivative work of Monotype’s copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

45. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

46. Irreparable damage may be presumed from a showing of copyright infringement.

47. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE’s copyright in a computer program entitled “Times

New Roman Italic TT,” registered with the United States Copyright Office as Registration Number TX 5-112-111;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number “TX 5-112-111;” and

(ii) otherwise infringing MONOTYPE’s copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-111 including, but not limited to, all printed materials, letters, memoranda, interoffice correspondence,

written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-111;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT V

(Copyright Infringement – TIMES NEW ROMAN BOLD TT)

48. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-114 is entitled "Times New Roman Bold TT" A true and accurate copy of the certificate of

registration is attached as Exhibit "F" hereto and by that reference is made a part hereof.

49. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

50. The software program identified as "timenrb_pfb" in Linux 7 OS is a derivative work of MONOTYPE's copyrighted computer program registered as aforesaid.

51. The copying and distribution of such derivative work of Monotype's copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

52. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

53. Irreparable damage may be presumed from a showing of copyright infringement.

54. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Times New Roman Bold TT," registered with the United States Copyright Office as Registration Number TX 5-112-114;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-114;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-114 including, but not

limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-114;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT VI
(Copyright Infringement – TIMES NEW ROMAN BOLD ITALIC TT)

55. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-112 is entitled "Times

New Roman Bold Italic TT.” A true and accurate copy of the certificate of registration is attached as Exhibit "G" hereto and by that reference is made a part hereof.

56. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

57. The software program identified as “timenrbi_pfb” in Linux 7 OS is a derivative work of MONOTYPE’s copyrighted computer program registered as aforesaid.

58. The copying and distribution of such derivative work of Monotype’s copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

59. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

60. Irreparable damage may be presumed from a showing of copyright infringement.

61. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Times New Roman Bold Italic TT" registered with the United States Copyright Office as Registration Number TX 5-112-112;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-112;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-112 including, but not

limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-112;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT VII
(Copyright Infringement of – ARIAL ROMAN TT)

62. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the

United States Copyright as Registration No. TX 5-014-242 is entitled "Arial Roman TT." A true and accurate copy of the certificate of registration is attached as Exhibit "H" hereto and by that reference is made a part hereof.

63. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

64. The software program identified as "ariam_pfb" in Linux 7 OS is a derivative work of MONOTYPE's copyrighted computer program registered as aforesaid.

65. The copying and distribution of such derivative work of Monotype's copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

66. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

67. Irreparable damage may be presumed from a showing of copyright infringement.

68. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Arial Black Roman TT," registered with the United States Copyright Office as Registration Number TX 5-014-242;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-014-242;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-014-242 including, but not

limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-014-242;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT VIII
(Copyright Infringement - ARIAL ITALIC TT)

69. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the

United States Copyright as Registration No. TX 5-112-108 is entitled "Arial Italic TT." A true and accurate copy of the certificate of registration is attached as Exhibit "I" hereto and by that reference is made a part hereof.

70. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

71. The software program identified as "arial_.pfb" in Linux 7 OS is a derivative work of MONOTYPE's copyrighted computer program registered as aforesaid.

72. The copying and distribution of such derivative work of Monotype's copyrighted program is without the permission or consent, express or implied, of MONOTYPE.

73. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

74. Irreparable damage may be presumed from a showing of copyright infringement.

75. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Arial Italic TT," registered with the United States Copyright Office as Registration Number TX 5-112-108;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-108;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States

Copyright Office as Registration Number TX 5-112-108 including, but not limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-108;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT IX
(Copyright Infringement– ARIAL BOLD TT)

76. MONOTYPE is the owner of the copyright in various computer

programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-109 is entitled "Arial Bold TT." A true and accurate copy of the certificate of registration is attached as Exhibit "J" hereto and by that reference is made a part hereof.

77. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

78. The software program identified as "ariab_.pfb" in Linux 7 OS is a derivative work of MONOTYPE's copyrighted computer program registered as aforesaid.

79. The copying and distribution of such derivative work of Monotype's copyrighted program is without the permission, express or implied, of MONOTYPE.

80. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

81. Irreparable damage may be presumed from a showing of copyright infringement.

82. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Arial Bold TT," registered with the United States Copyright Office as Registration Number TX 5-112-109;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-109;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in

concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-109 including, but not limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-109;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

G. Entry of a judgment granting such other and further relief as the court deems meet and just.

COUNT X
(Copyright Infringement – ARIAL BOLD ITALIC TT)

83. MONOTYPE is the owner of the copyright in various computer programs representing typeface designs. One such program, registered with the United States Copyright as Registration No. TX 5-112-116 is entitled “Arial Bold Italic TT.” A true and accurate copy of the certificate of registration is attached as Exhibit "K" hereto and by that reference is made a part hereof.

84. As the owner of such copyright, MONOTYPE has, *inter alia*, the exclusive rights to produce the copyrighted work in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public.

85. The software program identified as “ariabi_pfb” in Linux 7 OS is a derivative work of MONOTYPE’s copyrighted computer program registered as aforesaid.

86. The copying and distribution of such derivative work of Monotype’s copyrighted program is without the permission, express or implied, of MONOTYPE.

87. Unless enjoined by this court, RED HAT will continue to infringe such copyrighted work thereby causing MONOTYPE immediate and irreparable damage for which MONOTYPE has no adequate remedy at law.

88. Irreparable damage may be presumed from a showing of copyright infringement.

89. The infringement complained of herein was willful on the part of RED HAT.

NOW, THEREFORE, MONOTYPE prays for the following relief:

A. Entry of a judgment declaring that RED HAT has infringed and is infringing MONOTYPE's copyright in a computer program entitled "Arial Bold Italic TT," registered with the United States Copyright Office as Registration Number TX 5-112-116;

B. Entry of a judgment that RED HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries, parents, and affiliates, and all others in privity or acting in concert therewith, be enjoined pending disposition of this action and permanently from:

(i) advertising, licensing, selling, and/or distributing within the United States any product which contains a copy of all or a part of a computer program containing digitized typeface designs registered with the United States Copyright Office as Registration Number "TX 5-112-116;" and

(ii) otherwise infringing MONOTYPE's copyright.

C. Entry of a judgment temporarily and permanently enjoining RED

HAT, its officers, agents, employees, attorneys, successors and assigns, dealers, distributors, subsidiaries and affiliates, and all others in privity or acting in concert therewith, from destroying or altering in any manner any document or other materials relating in any way to the use by RED HAT of copies or derivative works of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-116 including, but not limited to, all printed materials, letters, memoranda, interoffice correspondence, written correspondence, electronic mail to and from any persons or entities who subscribed to RED HAT;

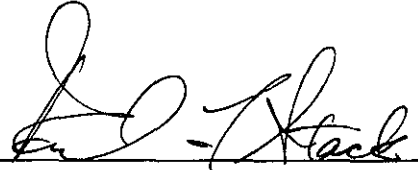
D. Entry of a judgment affirmatively enjoining RED HAT to deliver up for impoundment and destruction all products in the possession, custody, or control of RED HAT, including products in the possession of RED HAT's dealers and distributors, containing copies of all or a part of a copyright registered in the United States Copyright Office as Registration Number TX 5-112-116;

E. Entry of a judgment requiring RED HAT to pay MONOTYPE damages to be determined in accordance with Section 504 of the Copyright Act, Title 17, United States Code, Section 504;

F. An award of MONOTYPE's costs, including reasonable attorneys' fees;

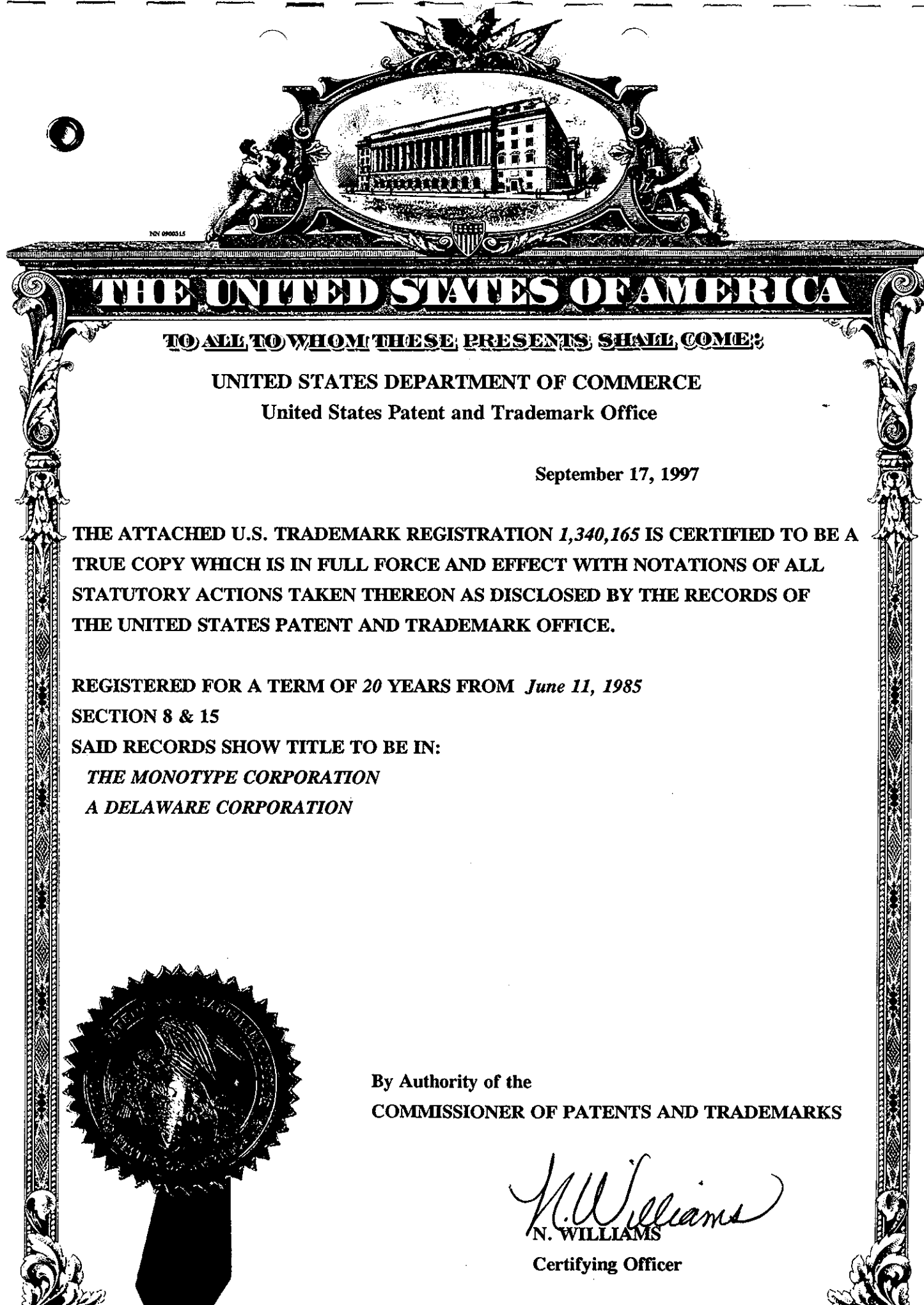
G. Entry of a judgment granting such other and further relief as the court deems meet and just.

THE MONOTYPE CORPORATION

By: 
One of the attorneys for Plaintiff

Paul F. Stack
Robert A. Filpi
STACK & FILPI CHARTERED
Suite 411
140 South Dearborn Street
Chicago, Illinois 60603-5298
(312) 782-0690
(312) 782-0936 facsimile

Exhibit A



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME;

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

September 17, 1997

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,340,165 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *June 11, 1985*

SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

THE MONOTYPE CORPORATION

A DELAWARE CORPORATION

By Authority of the

COMMISSIONER OF PATENTS AND TRADEMARKS

N. Williams
N. WILLIAMS

Certifying Officer

cls.: 9 and 16

for U.S. Cls.: 14, 26 and 38

United States Patent and Trademark Office

Reg. No. 1,340,165

Registered June 11, 1985

**TRADEMARK
PRINCIPAL REGISTER**

TIMES NEW ROMAN

MONOTYPE CORPORATION LIMITED; THE
(UNITED KINGDOM CORPORATION)
HONEYCROCK LA.
SALFORDS, REDHILL, SURREY, ENGLAND
RH1 5JP

FOR: TYPEFACES, TYPEFONTS, AND TYPE
DESIGNS OF ALPHANUMERIC CHARACTERS
AND/OR TYPOGRAPHICAL SYMBOLS RE-
CORDED AS LATENT IMAGES IN DATA
STORAGE MEDIA—NAMELY, MAGNETIC
TAPE, MAGNETIC DISC, OPTICAL MEMO-
RIES AND INTEGRATED CIRCUIT MEMO-
RIES, SUCH AS ROMS, PROMS AND EPROMS,
IN CLASS 9 (U.S. CLS. 26 AND 38).

FIRST USE 12-31-1978; IN COMMERCE
6-30-1980.

FOR: TYPEFACES, TYPEFONTS AND TYPE
DESIGNS OF ALPHANUMERIC CHARACTERS
AND/OR TYPOGRAPHICAL SYMBOLS RE-
CORDED AS VISIBLE IMAGES IN PRINTER'S
TYPE, PRINTER'S MATRICES OR PRINTED
MATTER, DRY TRANSFER PRESS LETTER-
ING, PHOTOGRAPHIC IMAGES, THERMAL
IMAGES, INK JET IMAGES AND VIDEO
IMAGES, IN CLASS 16 (U.S. CLS. 14 AND 38).

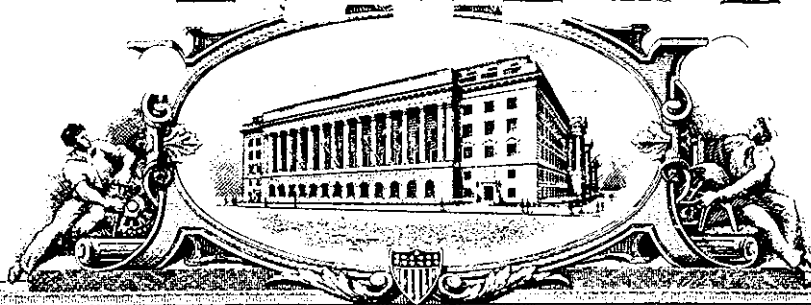
FIRST USE 12-31-1934; IN COMMERCE
12-31-1934.

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "ROMAN", APART FROM THE
MARK AS SHOWN.

SER. NO. 409,329, FILED 1-14-1983.

DONALD B. AIKEN, EXAMINING ATTORNEY

Exhibit B



THE UNITED STATES OF AMERICA

TO ALL TO WHOM THESE PRESENTS SHALL COME:

UNITED STATES DEPARTMENT OF COMMERCE

United States Patent and Trademark Office

September 17, 1997

THE ATTACHED U.S. TRADEMARK REGISTRATION 1,322,088 IS CERTIFIED TO BE A TRUE COPY WHICH IS IN FULL FORCE AND EFFECT WITH NOTATIONS OF ALL STATUTORY ACTIONS TAKEN THEREON AS DISCLOSED BY THE RECORDS OF THE UNITED STATES PATENT AND TRADEMARK OFFICE.

REGISTERED FOR A TERM OF 20 YEARS FROM *February 26, 1985*

SECTION 8 & 15

SAID RECORDS SHOW TITLE TO BE IN:

THE MONOTYPE CORPORATION

A DELAWARE CORPORATION



By Authority of the
COMMISSIONER OF PATENTS AND TRADEMARKS

N. Williams
N. WILLIAMS

Certifying Officer

Int. Cl.: 16

Prior U.S. Cls.: 14 and 38

United States Patent and Trademark Office

Reg. No. 1,322,088

Registered Feb. 26, 1985

TRADEMARK
Principal Register

ARIAL

The Monotype Corporation Limited (United
Kingdom corporation)
Honeyrock La.
Salfords, Redhill, Surrey, England RH1 5JP

For: TYPEFACES, TYPEFONTS, AND TYPE
DESIGNS OF ALPHANUMERIC CHARACTERS
AND/OR TYPOGRAPHICAL SYMBOLS RE-
CORDED AS LATENT IMAGES IN DATA
STORAGE MEDIA—NAMELY, MAGNETIC
TAPE, MAGNETIC DISC, OPTICAL MEMO-
RIES AND INTEGRATED CIRCUIT MEMO-
RIES, SUCH AS ROMS, PROMS AND EPROMS,
in CLASS 16 (U.S. Cls. 14 and 38).

First use May 31, 1983; in commerce May 31,
1983.

Ser. No. 451,087, filed Nov. 3, 1983.

J. TINGLEY, Examining Attorney

Exhibit C

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36 and 38

Reg. No. 2,270,853

United States Patent and Trademark Office

Registered Aug. 17, 1999

**TRADEMARK
PRINCIPAL REGISTER**

ARIAL

MONOTYPE CORPORATION, THE (DELA-
WARE CORPORATION)
985 BUSSE ROAD
ELK GROVE VILLAGE, IL 60007

FOR: TYPEFACES, TYPEFONTS, AND TYPE
DESIGNS OF ALPHANUMERIC CHARACTERS
AND/OR TYPOGRAPHICAL SYMBOLS RE-
CORDED AS LATENT IMAGES IN DATA
STORAGE MEDIA - NAMELY, MAGNETIC
TAPE, MAGNETIC DISCS, COMPACT DISCS,
OPTICAL MEMORIES AND INTEGRATED

CIRCUIT MEMORIES SUCH AS ROMS, PROMS
AND EPROMS, IN CLASS 9 (U.S. CLS. 21, 23, 26,
36 AND 38).

FIRST USE 11-30-1983; IN COMMERCE
11-30-1983.

OWNER OF U.S. REG. NO. 1,322,088.

SER. NO. 75-554,357, FILED 9-17-1998.

ELIZABETH J. WINTER, EXAMINING ATTOR-
NEY

Exhibit D

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

FORM TX
For a Non-dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TX 5-112-110



TX0005112110

EFFECTIVE DATE OF REGISTRATION

7 6 99
Month Day Year

OFFICIAL SEAL OF THE UNITED STATES COPYRIGHT OFFICE REGISTER OF COPYRIGHTS RATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

United States of America

TIMES NEW ROMAN TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

OR Citizen of ▼

Domiciled in: England

DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

OR Citizen of ▼

Domiciled in:

DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE Name of Country

OR Citizen of ▼

Domiciled in:

DATES OF BIRTH AND DEATH Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1990

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month: April Day: 6 Year: 1992

United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

DO NOT WRITE MORE THAN ONE CHECK PER PAGE

See instructions before completing this space.

MORE ON BACK ►

• Complete all applicable spaces (numbers 1-4) on the reverse side of this page.
• See detailed instructions.
• Sign the form at the bottom.

DO NOT WRITE

Page 1 of 2

CERTIFICATE OF REGISTRATION



OFFICIAL SEAL

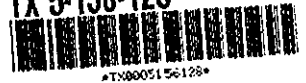
This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS

FORM 100-1
For Supplementary Registration
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NUMBER

TX 5-156-128



1X IXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A

Title of Work ▼

TIMES NEW ROMAN TT

Registration Number of the Basic Registration ▼

TX 5-112-110

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

• Complete all applicable spaces (D-G) on the reverse side of this page.
• See detailed instructions.
• Sign the form at Space F.

DO NOT WRITE HERE

Page 1 of _____

Exhibit E

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS

FORM TX
For a Monodramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TX 5-112-111



T0605112111

EFFECTIVE DATE OF REGISTRATION

7 6 99
Month Day Year

OFFICIAL SEAL

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

TIMES NEW ROMAN ITALIC TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ► England

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see instructions.

NOTE

Under the law, a "author" of "work made for hire" is normally the employer, not the employee (see instructions). For any work that was made for hire, check "Yes" in space provided, give the name of the employer or other person for whom the work was prepared. "Author" of a part, and give the date for dates birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

b

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ►

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

c

Was this contribution to the work a "work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ►

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1990

Year

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month ► April

Day ► 6

Year ► 1992

United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

DO NOT WRITE HERE. OFFICE USE ONLY.

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-6) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 8.

DO NOT WRITE

Page 1 of 2

CERTIFICATE OF REGISTRATION

or Supplementary registration
UNITED STATES COPYRIGHT OFFICE

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

TX 5-156-129



TX0005150129

Marybeth Peters

TX TXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 2 4 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

Title of Work ▼

TIMES NEW ROMAN ITALIC TT

Registration Number of the Basic Registration ▼

TX 5-112-111

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

• Complete all applicable spaces (D-G) on the reverse side of this page.
• See detailed instructions. • Sign the form at Space F.

DO NOT WRITE HERE

Page 1 of _____

Exhibit F

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 REGISTER OF COPYRIGHTS
 United States of America

For a Mandatory Literary Work
 UNITED STATES COPYRIGHT OFFICE

TX 5-112-114



TX000512114

EFFECTIVE DATE OF REGISTRATION

JUL 06 1999

Month Day Year

OFFICIAL SEAL

TITLE OF THIS WORK ▼

 RATE CONTINUATION SHEET.
 United States of America

1

TIMES NEW ROMAN BOLD TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

Was this contribution to the work a "work made for hire?"

☐ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

Domiciled in: England

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire?"

☐ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

Domiciled in: _____

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire?"

☐ Yes☐ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR Citizen of ▼

Domiciled in: _____

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ NoPseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1990

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month April Day 6 Year 1992

United States

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

 The Monotype Corporation
 985 Busse Road
 Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

 MORE ON BACK ► • Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
 • See detailed instructions. • Sign the form at the bottom.

DO NOT WRITE

Page 1 of 2

CERTIFICATE OF REGISTRATION

For Supplementary Registration
UNITED STATES COPYRIGHT OFFICE



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

TX 5-156-127



TX0005156127

TX TXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A

Title of Work ▼

TIMES NEW ROMAN BOLD TT

Registration Number of the Basic Registration ▼

TX 5-112-114

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation
was omitted at the time of basic registration.

MORE ON BACK ►

• Complete all applicable spaces (D-G) on the reverse side of this page.
• See detailed instructions. • Sign the form at Space F.

DO NOT WRITE

Page 1 of _____

Exhibit G

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

for a nontransferable Library Work
UNITED STATES COPYRIGHT OFFICE
REGISTRATION NO. 112112

TX 5-112-112



17/005112112

EFFECTIVE DATE OF REGISTRATION

7 6 99
Month Day Year

Marybeth Peters

REGISTER OF COPYRIGHTS LATE CONTINUATION SHEET.

TITLE OF THIS WORK ▼

United States of America

TIMES NEW ROMAN BOLD ITALIC TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ NoAUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ▼
Domiciled in: EnglandWAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to
of these questions
"Yes," see details
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ NoAUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ▼
Domiciled in: EnglandWAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to
of these questions
"Yes," see details
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ NoAUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR Citizen of ▼
Domiciled in: EnglandWAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to
of these questions
"Yes," see details
instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

a YEAR IN WHICH CREATION OF THIS
WORK WAS COMPLETED

1990

This information
must be given
in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work
has been published. Month: April Day: 6 Year: 1992

United States

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▼

• Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 8.

DO NOT WRITE HERE
OFFICE USE ONLY
Page 1 of 2

CERTIFICATE OF REGISTRATION

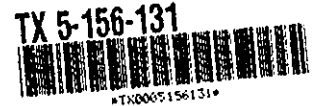
for Supplementary registration
UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters



TX TXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 2 4 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A

Title of Work ▼

TIMES NEW ROMAN BOLD ITALIC TT

Registration Number of the Basic Registration ▼

TX 5-112-112

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

- Complete all applicable spaces (D-G) on the reverse side of this page.
- See detailed instructions.
- Sign the form at Space F.

DO NOT WRITE HERE

Page 1 of _____ page

Exhibit H

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS SEPARATE CONTINUATION SHEET.

For a complete Library Work
UNITED STATES COPYRIGHT OFFICE

TX 5-014-242



TX005814242

EFFECTIVE DATE OF REGISTRATION

7 6 99

Month Day

TITLE OF THIS WORK ▼

ARIAL ROMAN TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of: _____
Domiciled in: England

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe the nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of: _____
Domiciled in: _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe the nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"? ☐ Yes ☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of: _____
Domiciled in: _____

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe the nature of material created by this author in which copyright is claimed. ▼

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

a 1990

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

b Complete this information if the work has been published. Month: April Day: 6 Year: 1999

United States

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▶

• Complete all applicable spaces (numbers 5-6) on the reverse side of this page.
• See detailed instructions.
• Sign the form at line 6.

DO NOT WRITE HERE

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

UNITED STATES COPYRIGHT OFFICE
REGISTRATION

TX 5-156-121



TX TXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A

Title of Work ▼

ARIAL ROMAN TT

Registration Number of the Basic Registration ▼

TX 5-014-242

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

- Complete all applicable spaces (D-G) on the reverse side of this page.
- See detailed instructions.
- Sign the form at Space F.

DO NOT WRITE HERE

Exhibit I

UNITED STATES COPYRIGHT OFFICE
For a reproduction Library Work
UNITED STATES COPYRIGHT OFFICE

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

TX 5-112-108



T 00000112108

EFFECTIVE DATE OF REGISTRATION

JUL 06 1999

Month Day Year

Marybeth Peters

RATE CONTINUATION SHEET.

1

OFFICIAL SEAL TITLE OF THIS WORK ▼

REGISTER OF COPYRIGHTS
United States of America

ARIAL ITALIC TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NAME OF AUTHOR ▼

a The Monotype Corporation, PLC

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?

☐ Yes
☐ No
AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▼
Domiciled in: England

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and save the space for dates of birth and death blank.

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?

☐ Yes
☐ No
AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▼
Domiciled in: England

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?

☐ Yes
☐ No
AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ▼
Domiciled in: England

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1990

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month: April Day: 2 Year: 1992
United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

MORE ON BACK ▶

• Complete all applicable spaces (numbers 2-4) on the reverse side of this page.
• See detailed instructions.
• Sign the form at the B.

DO NOT WRITE

Page 1 of 2

CERTIFICATE OF REGISTRATION

Supplementary Registration
UNITED STATES COPYRIGHT OFFICE
REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

TX 5-156-124



TX TXU PA PAU VA VAU SR SRU
EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A

Title of Work ▼

ARIAL ITALIC TT

Registration Number of the Basic Registration ▼

TX 5-112-108

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

- Complete all applicable spaces (D-G) on the reverse side of this page.
- See detailed instructions.
- Sign the form at Space F.

DO NOT WRITE

Page 1 of 2

Exhibit J

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

For a Non-dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TX 5-112-109



EFFECTIVE DATE OF REGISTRATION

JUL 06 1999

Month Day Year

ARATE CONTINUATION SHEET.

1

OFFICIAL SEAL
TITLE OF THIS WORK ▼

REGISTER OF COPYRIGHTS
United States of America

ARIAL BOLD TT

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

a NAME OF AUTHOR ▼

The Monotype Corporation, PLC

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▼
Domiciled in: England

WAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

Computer Program

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▼
Domiciled in:

WAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a
"work made for hire"?
☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ▼
Domiciled in:

WAS THIS AUTHOR'S CONTRIBUTION
THE WORK
Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

3

a YEAR IN WHICH CREATION OF THIS

WORK WAS COMPLETED

1990

Year

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month ▼ April Day ▼ 6 Year ▼ 1992

United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 06 1999

ONE DEPOSIT RECEIVED

JUL 06 1999

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

See instructions before completing this space.

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-8) on the reverse side of this page.
• See detailed instructions.

• Sign the form at line 8.

DO NOT WRITE

Page 1 of 2

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

UNITED STATES COPYRIGHT OFFICE

REGISTRATION NUMBER

TX 5-156-126



EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000

Month Day Year

OFFICIAL SEAL

REGISTER OF COPYRIGHTS

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

Title of Work ▼

ARIAL BOLD TT

Registration Number of the Basic Registration ▼

TX 5-112-109

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

• Complete all applicable spaces (D-G) on the reverse side of this page.
• See detailed instructions. • Sign the form at Space F.

DO NOT WRITE

Page 1 of _____

Exhibit K

CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

UNITED STATES COPYRIGHT OFFICE

TX 5-112-116



EFFECTIVE DATE OF REGISTRATION

Month 7 Day 6 Year 99

Marybeth Peters

REGISTER OF COPYRIGHTS
United States of America

RATE CONTINUATION SHEET.

1

OFFICIAL SEAL OF THIS WORK

ARIAL BOLD ITALIC TT

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

2

NAME OF AUTHOR

a The Monotype Corporation, PLC

Was this contribution to the work a "work made for hire?"

☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of England
Domiciled in England

DATES OF BIRTH AND DEATH

Year Born Year Died

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

Computer Program

NAME OF AUTHOR

Was this contribution to the work a "work made for hire?"

☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of
Domiciled in

DATES OF BIRTH AND DEATH

Year Born Year Died

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

NAME OF AUTHOR

Was this contribution to the work a "work made for hire?"

☐ Yes
☐ No

AUTHOR'S NATIONALITY OR DOMICILE

OR { Citizen of
Domiciled in

DATES OF BIRTH AND DEATH

Year Born Year Died

WAS THIS AUTHOR'S CONTRIBUTION THE WORK

Anonymous? ☐ Yes ☐ No
Pseudonymous? ☐ Yes ☐ No

If the answer to these questions is "Yes," see the instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1990

This information must be given in all cases.

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month April Day 6 Year 1992
United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

The Monotype Corporation
985 Busse Road
Elk Grove Village, IL 60007

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK ▶ • Complete all applicable spaces (numbers 3-6) on the reverse side of this page.
• See detailed instructions. • Sign the form at the 6.

DO NOT WRITE
OFFICE USE ONLY
Page 1 of 1

CERTIFICATE OF REGISTRATION



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 REGISTER OF COPYRIGHTS

Sup. Intar. Istral
 UNITED STATES COPYRIGHT OFFICE
 REGISTRATION NUMBER

TX 5-156-125



TX0005156125

TX TXU PA PAU VA VAU SR SRU
 EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

JUL 24 2000
 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

A Title of Work ▼

ARIAL BOLD ITALIC TT

Registration Number of the Basic Registration ▼

TX 5-112-116

Year of Basic Registration ▼

1999

Name(s) of Author(s) ▼

The Monotype Corporation, PLC

Name(s) of Copyright Claimant(s) ▼

The Monotype Corporation

B Location and Nature of Incorrect Information in Basic Registration ▼

Line Number _____ Line Heading or Description _____

Incorrect Information as It Appears in Basic Registration ▼

Corrected Information ▼

Explanation of Correction ▼

C Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number 4 Line Heading or Description Transfer

Amplified Information and Explanation of Information ▼

Amplification:

By written Assignment dated February 16, 1993

Explanation:

Information on the Assignment from the predecessor corporation was omitted at the time of basic registration.

MORE ON BACK ►

• Complete all applicable spaces (D-G) on the reverse side of this page.
 • See detailed instructions. • Sign the form at Space F.

DO NOT WRITE

Page 1 of _____

Notification of Affiliates
Disclosure Statement

Microsoft Corporation owns more than ten percent of the stock of
The Monotype Corporation

Civil Cover Sheet

Page 1 of 1

(CT 2)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JUDGE NORDBERG

MAGISTRATE JUDGE
GERALDINE SOAT BROWN

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

**Plaintiff(s): THE MONOTYPE
CORPORATION**
Defendant(s): RED HAT, INC.

County of Residence: Cook

County of Residence:

 Plaintiff's Atty: Paul F. Stack
 Stack & Filpi Chartered
 140 S. Dearborn St., Suite 411
 Chicago, IL 60603
 312-782-0690

Defendant's Atty:

02C 3713

 DOCKETED
 MAY 24 2002

FILED-EDS

02 MAY 23 PM 3:30

 CLERK
 U.S. DISTRICT COURT

II. Basis of Jurisdiction:
3. Federal Question (U.S. not a party)
III. Citizenship of Principal
Parties (Diversity Cases Only)

Plaintiff:- N/A

Defendant:- N/A

IV. Origin :
1. Original Proceeding
V. Nature of Suit:
840 Trademark
VI. Cause of Action:
**Trademark infringement under the Lanham Act and copyright
infringement under the Copyright Act.**
VII. Requested in Complaint

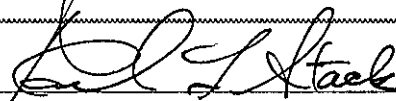
Class Action: No

Dollar Demand:

Jury Demand: No

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature:



Date:

May 23, 2002

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.**

Revised: 06/28/00

1-2

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Eastern Division

JUDGE NORDBERG

MAGISTRATE JUDGE
GERALDINE SOAT BROWN

In the Matter of

THE MONOTYPE CORPORATION,
Plaintiff,
vs.
RED HAT, INC.,
Defendant.

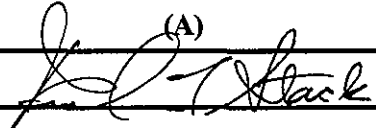
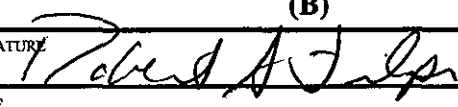
DOCKETED

02C 3713
Case Number

MAY 24 2002

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Plaintiff, THE MONOTYPE CORPORATION

(A)		(B)	
SIGNATURE 		SIGNATURE 	
NAME Paul F. Stack		NAME Robert A. Filpi	
FIRM Stack & Filpi Chartered		FIRM Stack & Filpi Chartered	
STREET ADDRESS 140 S. Dearborn St, Suite 411		STREET ADDRESS 140 S. Dearborn St., Suite 411	
CITY/STATE/ZIP Chicago, Illinois 60603-5298		CITY/STATE/ZIP Chicago, Illinois 60603-5298	
TELEPHONE NUMBER (312) 782-0690		TELEPHONE NUMBER (312) 782-0690	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 2698544		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 804444	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER		TELEPHONE NUMBER	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

FILED
MAY 23 11:30
U.S. DISTRICT COURT

1-3